

1 **GERAGOS & GERAGOS**

2 A PROFESSIONAL CORPORATION

3 LAWYERS

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11 **UNITED STATES DISTRICT COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA**

13 ULRICH RISCHER, an individual,) Case No. CV 96-3886 SJO-RNB
14)
15 Plaintiff,)
16 vs.)
17 BANLAVOURA I INC. TRUST, a)
18 California corporation, ENGLEWOOD I)
19 INC. TRUST, a California corporation,)
20 BANLAVOURA I INC., a California)
21 corporation, ENGLEWOOD I INC., a)
22 California corporation, LARRY)
23 ESACOVE, an individual, AIDA)
24 ESACOVE, an individual, *et al.*)
25 Defendants.)
26

27 DECLARATION OF MARK J.
28 GERAGOS IN SUPPORT OF
29 MOTION TO QUASH THIRD
30 PARTY SUBPOENA

31 Date: June 15, 2010
32 Time: 9:30 a.m.
33 Dept: 880

34 **DECLARATION OF MARK J. GERAGOS**

35 1. I am an attorney licensed to practice law before all of the Courts of
36 the State of California. I have personal knowledge of the following facts and if
37 called as a witness, I could and would competently testify thereto.

38 2. I am a resident of the County of Los Angeles where I have been
39 residing since becoming a member of the State Bar of California in 1983.

40 3. My business address is 644 South Figueroa Street, Los Angeles,

1 California 90017.

2 4. I have not been personally served with a subpoena to appear at the
3 judgment debtor examination scheduled for June 15, 2010.

4 5. I am the Principal of the firm Geragos & Geragos, APC. Nobody by
5 the name of Eric works for my law firm nor have I employed anybody by the name
6 of Eric for at least the past five years. Certainly no one by the name of Eric is "in
7 charge at GERAGOS & GERAGOS."

8 6. Steve Davis is not authorized to accept service on behalf of Geragos
9 & Geragos and he is not authorized to accept service on my behalf. Steve Davis is
10 a security guard employed by Securitas and not by me or my firm. I understand
11 that I am personally named in the Subpoena.

12 7. Both of the \$50,000 payments from Ms. Esacove for legal
13 representation were deposited directly into the firm's general account. The funds
14 in question were placed into the general account because they were earned by
15 Geragos & Geragos upon receipt and were non-refundable. Attached hereto as
16 Exhibit "A" are true and correct copies of the Deposit Summaries of both these
17 checks.

18 8. Were I to appear at the judgment debtor examination for the judgment
19 debtors, I would have a duty to assert attorney-client privilege as to any further
20 information sought during the examination.

21 I declare under penalty of perjury under the laws of the United States of
22 America and the State of California that the foregoing is true and correct.

23 Executed on this 8th day of June, 2010 at Los Angeles, California.

24
25
26 /s/ Mark J. Geragos
27 MARK J. GERAGOS
28